

**INTERVENTION**



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AZ CORP COMMISSION  
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Attorneys for Western Resource Advocates

**BEFORE THE ARIZONA CORPORATION COMMISSION**

Arizona Corporation Commission

MIKE GLEASON, CHAIRMAN  
WILLIAM A. MUNDELL  
JEFF HATCH-MILLER  
KRISTIN K. MAYES  
GARY PIERCE

**DOCKETED**

MAR 7 2008

DOCKETED BY

IN THE MATTER OF THE APPLICATION  
OF TUCSON ELECTRIC POWER  
COMPANY FOR APPROVAL OF ITS  
RENEWABLE ENERGY STANDARD AND  
TARIFF IMPLEMENTATION PLAN.

Docket No. E-01933A-07-0594

**PETITION FOR LEAVE TO  
INTERVENE OF WESTERN  
RESOURCE ADVOCATES**

Pursuant to the Rules of Practice and Procedure of the Arizona Corporation  
Commission (Commission), Western Resource Advocates (WRA) hereby moves to  
intervene in the above-captioned docket and, in support thereof, states as follows:

1. WRA is a regional environmental law and policy center serving the Rocky  
Mountain and Desert Southwest states. WRA has been involved in proceedings before  
the Commission for nearly fifteen years and has been granted intervenor status in  
numerous dockets. As part of this work, WRA has represented a number of other  
Arizona non-profit organizations on energy issues. WRA has a board member, staff and  
members who live and recreate in Arizona and/or are TEP electric ratepayers.

1           2.     WRA's Energy Program promotes policies and programs designed to  
2 encourage the development of clean energy power production technologies, energy  
3 efficiency, renewable resources, distributed generation, and other measures that help  
4 reduce the environmental impacts of meeting the demand for energy services and  
5 encourage sustainable rural economic development, while minimizing the costs and risks  
6 to ratepayers of fuel price volatility and environmental regulatory requirements. It has  
7 appeared in rate proceedings before the Commission and in other state and federal  
8 regulatory forums to recommend, among other things, improvements in rate design for  
9 sending efficient price signals and cost recovery mechanisms for investments in  
10 renewable energy and energy efficiency.  
11

12           3.     Intervention by WRA will not unduly broaden the issues or delay the  
13 proceeding. WRA does not yet know what position it will take in this proceeding.  
14

15           4.     WRA requests that all pleadings, correspondence, discovery, and other  
16 documents be served on the following:  
17

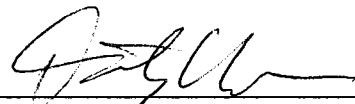
18                   Timothy M. Hogan  
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25                   David Berry  
                  Western Resource Advocates  
                  P.O. Box 1064  
                  Scottsdale, AZ 85252-1064  
                  (480) 990-7209 (fax is the same)  
                  azbluhill@aol.com

1           Wherefore, WRA respectfully requests that the Commission issue an order  
2 granting its Motion to Intervene in the above-captioned proceeding.

3           DATED this 7<sup>th</sup> day of March, 2008

4                                   ARIZONA CENTER FOR LAW IN  
5                                   THE PUBLIC INTEREST


6                                   By   
7                                   Timothy M. Hogan  
8                                   202 E. McDowell Rd., Suite 153  
9                                   Phoenix, Arizona 85004  
                                  Western Resource Advocates

10          ORIGINAL and 13 COPIES of  
11          the foregoing filed this 7<sup>th</sup> day  
12          of March, 2008, with:

13          Docketing Supervisor  
14          Docket Control  
15          Arizona Corporation Commission  
                1200 W. Washington  
                Phoenix, AZ 85007

16          COPIES of the foregoing  
17          electronically mailed this  
18          7<sup>th</sup> day of March, 2008, to:

19          All Parties of Record

20                                     
21                                   \_\_\_\_\_  
22  
23  
24  
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